

**PLAINTIFFS EXHIBIT 8**

**EXCERPTS FROM DEPOSITION OF LATERIKA MARTIN**



Laterika Martin - December 21, 2017

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1       A.    Yeah, in Medical.

2       Q.    This --

3       A.    So you have your medical staff and you have our  
4 desk right here, the security staff.

5       Q.    Okay.

6       A.    Yeah.

7       Q.    So when you arrived at Medical, was there anybody  
8 in there on January the 1st?

9       A.    No, sir.

10      Q.    Briefly describe the facility -- the medical  
11 facility here at the prison.

12      A.    Okay. When you come in the door, you have the  
13 waiting room where the inmates sit. It's double doors  
14 when you come in and when you see where the inmates are  
15 assigned, and the next door you go in, you enter Medical.  
16 Do you want me to describe Medical to you?

17      Q.    Uh-huh (affirmative response).

18      A.    All right.

19      Q.    Yes.

20      A.    Okay. So to my right side, you will see the --  
21 our watch station that would be on the left side if you're  
22 turned -- if you're facing towards the fire and safety  
23 door. Then you have the Emergency Room and Dr. Woods'  
24 office, and towards my left, if you're turning towards  
25 PO-2, which goes to the access door, you have Nurse Cox's

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1 look around and make sure everybody is all right and  
2 nothing happened and we go.

3 Q. You weren't doing that, though, at that time,  
4 right --

5 A. No. Because --

6 Q. -- on January 1st?

7 A. No. When that happened I was just making it to  
8 Medical, and that happened about 10, 20 minutes after, you  
9 know, I went into Medical. By that time, they was  
10 counting so they counted -- that's probably how, you know,  
11 they caught that code such at an early time.

12 Q. Right.

13 A. Because, you know, we count at -- in the morning  
14 times at 6:00, 10:00, 12:00 and 2:00, so, like I said, at  
15 that time, they were probably counting when that happened.

16 Q. Okay. Do they -- who does the count?

17 A. The COs.

18 Q. Okay. And does the CO go into the dorm?

19 A. Yes, sir. You have to go into the dorm. If you  
20 don't see -- if you don't see them breathing or it looks  
21 like they're breathing, you tap them on the foot with  
22 paper or your clipboard, whatever you go in with. You  
23 just tap them on the foot just to make sure, you know --

24 Q. Okay. I'm looking at the -- the first shift,  
25 which is -- begins at 6:00 in the morning --

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1       A.    Yes, sir.

2       Q.    He was --

3       A.    He was.

4       Q.    -- alive.

5       A.    He was.

6       Q.    He was having difficulty breathing, correct?

7       A.    Yes, sir, he was.

8       Q.    Was he saying anything?

9       A.    At the time of him coming in Medical, no, sir.

10      Q.    Okay. Did you hear him say anything that  
11 morning?

12      A.    No, sir, I didn't.

13      Q.    Okay. Did he --

14      A.    Like I said, he was --

15      Q.    -- did he make -- did he make any kind of a  
16 noise, grunt or --

17      A.    Just gasping for breath like -- (witness  
18 demonstrating). Just gasping for breath.

19      Q.    Okay. And when you say he flatlined, was he  
20 hooked up to a machine that showed that he was --

21      A.    No. He just stopped breathing all of a sudden.

22      Q.    Okay. What, just two minutes after he got into  
23 the room?

24      A.    Yes, sir.

25      Q.    There was another nurse, Nurse Taylor --

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1 A. Uh-huh (affirmative response).

2 Q. -- present, right?

3 A. Uh-huh (affirmative response.)

4 MR. DAVIS: Yes?

5 A. She stayed -- yes. I'm sorry. Yes, sir. She  
6 stayed in Medical.

7 BY MR. LEWIS:

8 Q. Okay. And she asked -- she yelled, call 911?

9 A. Uh-huh (affirmative response), yes, sir.

10 Q. Why would one wait until the person is in Medical  
11 to call 911?

12 A. Because he was breathing at the time. He wasn't  
13 dead or anything. It's -- I guess they thought that, you  
14 know, it -- it wouldn't turn left so fast, but soon after  
15 he stopped breathing, that's -- she immediately said, call  
16 911.

17 Q. Okay. I -- I take it that was a call for an  
18 ambulance; is that --

19 A. Yes, sir.

20 Q. And where would that ambulance come from?

21 A. I would have no clue.

22 Q. Okay.

23 A. Yes, sir.

24 Q. That's all right.

25 A. I would not have a clue.



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1 Q. That's -- that's fine. You -- when you don't  
2 know the answer, just say so. Okay?

3 A. (Witness nodded head affirmatively).

4 Q. Do you -- were you present when the ambulance did  
5 arrive?

6 A. Yes, sir, I was.

7 Q. Was Mr. Green still breathing when they arrived?

8 A. No, sir. We were still doing CPR until they  
9 came.

10 Q. You were helping with the CPR, right?

11 A. Yes, sir, I was.

12 Q. Lieutenant Blake was in the room?

13 A. Yes, sir. Lieutenant was still in the room.

14 Q. And she was in the process of calling a --  
15 everyone who needed to be alerted --

16 A. Yes, sir.

17 Q. -- that there was a death, right?

18 A. Yes, sir.

19 Q. Okay. What were the -- in -- in -- in addition  
20 to the CPR, what -- what else was done to try to revive  
21 him?

22 A. The defibrillator gave him a shock.

23 Q. Uh-huh (affirmative response). Did that have any  
24 effect on him?

25 A. Not really.

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1 Q. Okay. Well, do you know what the -- they -- they  
2 talk here that -- something about a kit. Where is it? It  
3 might be in somebody else's statement. Ignore that  
4 question.

5 A. I -- I think I had the defibrillator in mine, but  
6 I don't -- I don't know.

7 Q. Okay. You -- you wrote in here that John Green  
8 actually did come back meaning he did -- was aroused by  
9 the defibrillation; is that --

10 A. Uh-huh (affirmative response).

11 Q. Yes?

12 A. Yes, sir.

13 Q. Do you recall that now?

14 A. I do.

15 Q. Okay.

16 A. Let me see.

17 Q. Did the -- do you recall the nurse -- Nurse Mason  
18 asking him questions?

19 A. She did. She asked -- now that I think about it,  
20 she did ask -- she asked what was his name? He wasn't  
21 saying anything, though. He was looking and just -- you  
22 know, just rolling his eyes and just --

23 Q. As -- as I --

24 A. -- staring.

25 Q. Okay.

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1           A.    But she was asking, do you know your name? Do  
2 you know where you are, and he just kept looking.

3           Q.    Rolling his eyes?

4           A.    Rolling his eyes just looking.

5           Q.    No answer?

6           A.    No answer.

7           Q.    All right. What do you -- what do you mean when  
8 you say, he responded well until Nurse Taylor started CPR?

9           A.    Where are we at?

10          Q.    Okay. After -- after Mason started asking him  
11 questions.

12          A.    Responding well, like I was -- I was saying with  
13 his eyes.

14          Q.    Right.

15          A.    That's the only response he gave.

16          Q.    All right. And when Nurse Mason said, stop.  
17 Stop, is she referring to the CPR?

18          A.    Yes, sir.

19          Q.    And you say he -- she said, he's fine?

20          A.    Uh-huh (affirmative response).

21               MR. DAVIS: Yes, or, no.

22          A.    Yes, sir. (Examining document). Stop. Stop.  
23 He's fine.

24 BY MR. LEWIS:

25          Q.    Did you think he was fine?